Wheelock

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Members of the Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Members of the Federal Communications Commission:

Enclosed you will find the article, "Television For (Not Against) Children: Developmentally Appropriate Programming." Nancy Carlsson-Paige and I would like to submit if as our comments about how to implement policies and rules on meeting the "educational and informational needs of children" in children's television programming (MM Docket No. 93-48).

The article shows how much of current children's television program content does not meet children's needs and why. But more importantly, it uses current knowledge about children's development and learning to spell out how the content on children's television could appropriately support young children's development and learning.

As experts on the effects of media on children's development and learning who have documented the disastrous effects deregulation of children's television has had on children, families and schools, we urge that the kind of information contained in the article be incorporated into FCC guidelines on what constitutes meeting the educational and information needs of children. It is vital that in establishing the guidelines, you use what is known about how to support healthy development in the early years.

We welcome this chance to submit comments to you and would

Television For (Not Against) Children:
Developmentally Appropriate Programming

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Young children growing up in the United States today watch an average of four hours of television a day or 28 hours a week (Tuchscherer, 1988). In low income homes they spend an estimated 50 percent more time watching (Miedzian, 1991). These figures do not take into account the time children spend using VCR's (which are now owned by at least two-thirds of US households) or playing video games like Nintendo. Many young children spend far more time watching the TV screen than they spend in school, engaged in play, or interacting with other children and adults.

What are children seeing and what lessons are they learning during all

both their overall programming and programming specifically designed to meet these needs."[1]

The Act does not specify what would constitute meeting "the educational and information needs of children," so into this vacuum the television industry introduced a new claim: *that existing cartoon shows were in fact educational.* However, prior to the 1990 law, the industry had repeatedly argued that TV cartoon shows were NOT educational, but were designed to entertain (Maslin, 1992). In its recent license renewal application, one station reported to the FCC that in the "GI Joe" series, "the Joes fight against an evil that has the capabilities of mass destruction of society. Issues of social consciousness and responsibility are show themes" (Center for Media Education, 1992). The absurdity of the argument that a war cartoon teaches children social consciousness and is therefore educational is obvious and, along with the flip-flop nature of industry

There is an impressive and growing body of knowledge about what constitutes developmentally appropriate and inappropriate education for young children which has increasingly served to guide practice in early childhood classrooms (for instance, see Bredekamp, 1990; Bredekamp & Rosegrant, 1992). This body of knowledge can serve as the basis for establishing guidelines for developmentally appropriate media. Such guidelines could be used to determine how well the educational and informational needs of children are being served by the television industry and could be extended to all forms of media and media related products designed for children.

ESTABLISHING A DEVELOPMENTAL FRAMEWORK.

Children have several central developmental needs in the early years and their healthy development depends on the opportunities they have to work on them. By definition, developmentally appropriate practice in any domain, including children's television, would support and promote children's healthy, optimal development if it were helping them work on meeting these needs.

Trust and Safety.

Developing a sense of trust -- a deep belief that the world is a safe place and that "I can count on being cared for and being kept safe" -- is necessary for healthy development in the early years (Erikson, 1950). Adults need to provide an environment where children feel safe, with people who can be trusted to respond in predictable and consistent ways (Balaban, 1985). When children feel safe they are able to learn; they can take risks, try out new actions and ideas, and explore their world. Young children who develop a sense of trust are more likely to approach new experiences with a curiosity and openness. Children who learn to see the world as dangerous and unpredictable are more likely to

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3

approach new events and people with caution, putting more energy into self-protection than into exploring and discovering.

• **What children need.** The kind of world presented to children via television is important to their developing ideas about safety. Developmentally appropriate television would present a world where people can be trusted, where evil and danger are not lurking in every corner. Programs should show children what they can do to feel safe and keep themselves safe and how to help others do the same. Television could also help children confront and master the common childhood fears and 'monsters' they must tame in the early years. A character like Oscar the Grouch, the Muppet puppet on "Sesame Street", provides children with a wonderful example of a character who acts out children's wish to be naughty and grumpy but continues to remain safe and secure. "The Neighborhood of Make-believe" on "Mr. Rogers Neighborhood" presents children with a fantasy puppet world where people support and help each other amidst all their conflicts and needs.

• **What children see on television.** Many contemporary cartoon series and other programs children watch present a world filled with violence and evil, where "bad guys" constantly threaten the safety of "good guys", usually with some form of violence. In each episode, heroes and heroines must be on guard at all times because violent, evil forces lurk and threaten happiness and security (Hesse, 1989). Cobra threatens GI Joe, Shredder and the evil "foot soldiers" do evil to the Teenage Mutant Ninja Turtles, and an endless stream of evil polluters who are out to destroy the earth on the show Toxic Crusaders. In these shows, the characters and settings may change but the underlying message of instability and threat is repeated over and over, giving children an impression of a world they cannot trust.

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- **Conclusion.** The violent and scary stories and themes on many children's TV programs today are developmentally inappropriate because they undermine children's ability to feel safe and secure. They teach children to distrust others and to expect danger and then do not help children confront and resolve their fears. Rampant and gratuitous violence replaces what is an important opportunity to show children deeper, more substantial ways to resolve

off from home on his own in a fit of anger , then tames and befriends the scary "wild things," also supports children's need to establish a sense of autonomy with interdependence.

• **What children see on television**.   Many current cartoons and other children's programs present separation and connection as polar opposites; characters are either separate OR connected.   What is worse, separation is commonly equated with violence and hurt toward others, and connection with helplessness and victimization. To be separate usually means to be male, strong and powerful, armed with weapons, unfeeling and able to take care of oneself. To be connected usually means to be female, weak, dependent, and constantly in need of rescue.

• **Conclusion.** The messages children are getting about autonomy and closeness from mass media do not serve their developmental needs. Models that dichotomize independence and closeness give children a false (and potentially

- **What children need.** Television should help children feel that they can

Gender Identity.

It is during the early years that children first learn to label their gender as 'boy' or 'girl' and then try to figure out "what can I and should I do because I am a boy or a girl?" (Kohlberg, 1966). The more broadly children answer this question, the more they are likely to develop to their full potential; the narrower their definition of gender, the more likely will their potential be restricted. Because young children tend to divide concepts into dichotomous categories, they easily form stereotypes about gender; things are either for one gender OR the other, but not BOTH. In order to develop a broad definition of their own gender and of what they are capable of doing, they need to be shown that boys and girls can do a wide-range of things many of which are common to both sexes.

- **What children need.** To assist children in developing their full potential as girls and boys, television and other media should provide models of both sexes engaging in a wide-range of activities. Children need to see complex characters who embody characteristics traditionally thought of as both male and female in order to open up possibilities for themselves. Returning to Dorothy, she is a complex character who does not fit a gender stereotype; Dorothy feels vulnerable and longs for connection while also acting in powerful and effective

spend a lot of time caring about how they look. They are weak and helpless and often need to be rescued by males. (Carlsson-Paige & Levin, 1990).

• **Conclusion.** Television gives children a restricted picture of what it means to be a boy or girl, exaggerating a tendency for stereotyping naturally occurring in young children. Healthy development is undermined as children's ideas of who and what they can become narrows. At the same time, the gulf in understanding between the sexes widens for children as television accentuates the differences.

Appreciation of Diversity Among People.

Young children are in the process of learning about who they are as individuals and as members of a broader society, about how they are alike and different from other people, and about how people of diverse backgrounds and experience treat each other. (Derman-Sparks et al., 1989).

• **What children need.** Television, as a window into the world beyond children's immediate experience, has the potential to expose children to diverse people and to model ways diverse people can respect and learn from each other. The Tin Woodsman, Lion and Scarecrow scare Dorothy at first because they are different from her and have "special needs." But they quickly learn to trust and care for each other in respectful ways that mutually benefit them all. The diverse ethnic and racial backgrounds of the actors and actresses who live and work together on Sesame Street provide children with a model of diversity enriching a community.

• **What children see on television.** Many children's television programs promote suspicion, intolerance, and even violence against those who are different. Racial and ethnic stereotypes are common. Often, "bad guys" have characteristics that are different from the "good guys" who represent mainstream white US society. "Bad guys" are often from foreign countries and speak with

9

foreign-sounding accents. Many are dehumanized all together -- with computer-simulated voices, masks that disguise their faces, and maimed or robot-like bodies. Good characters fight violently against the bad; they can hurt and easily hate these characters whose humanity is rarely shown.

• **Conclusion.** Much of the television young children see today impedes their ability to develop an appreciation and respect for differences among people (Carlsson-Paige & Levin, 1990; Hesse, 1990). Suspicion and hatred of differences and violence against it is fostered. There are few opportunities for children to see how differences among people can be worked out in non-violent ways for the benefit of all; few models are presented which show how differences among people can enhance human experience or broaden horizons.

Sense of Morality and Social Responsibility.

Young children are developing ideas about morality and justice and about how people should treat each other (Gilligan, 1982; Kohlberg, 1968; Piaget, 1948). They do this, in part, by seeing others' reactions to the things that they do. In their efforts to please those they care about, they try to figure out what is seen by others as good, and what is seen as bad. Along with this, they are also trying to learn to control their aggressive impulses when they are frustrated or upset as they gradually learn "to use words" and other socially acceptable ways to express negative feelings. Young children's thinking leads them to divide things up into categories -- either all good or all bad, all right or all wrong -- and they do not always get the underlying causal logic for why people respond to each other as they do.

• **What children need.** Television should provide children with many opportunities to learn about being responsible and moral members of a community -- seeing people treat each other with kindness and respect, helping one another, and working out problems without resorting to violence. It should

help children get beyond the simple view of things as all good or all bad, to a more complex understanding of right and wrong -- for instance, showing children situations where characters face moral dilemmas and have to figure out the "right" thing to do. It should help them learn to decenter and gradually to coordinate different points of view (Selman, 1980). In the final scene of The Wizard of Oz, Dorothy expresses a moral conflict as she realizes that the satisfaction of her desire to go home means that she has to leave behind those she loves in the Land of Oz.

• **What children see on television**. Most commercial television programs for children present unidimensional characters that are either "all good" OR "all bad" who lack the complexity of real human character. Questions of social responsibility and morality are not considered as good characters attack and maim bad ones. Common moral lessons to children are that might equals right, bad people deserve to be hurt and there *is* always a single, violent solution to every problem.

• **Conclusion.** Commercial television undermines the development of morality and social responsibility in young children. It teaches that violence is justified and even a glamorous way to resolve conflict. It contributes to simplistic moral thinking and does not help children develop tools for solving moral dilemmas. Furthermore, it provides few positive models of how people can treat each other and places little value on people treating each other with respect and humanity.

Opportunities for Meaningful Play.

Play is basic to the healthy development and learning of children (Piaget, 1962). It is a primary vehicle through which they construct ideas about the world and come to understand their own experience. Through the process of play children can master experiences that may have been scary or difficult for them;

11

they can learn to think creatively, take risks, and learn to solve problems. But in order for all this to occur, the right conditions for play must exist. Children need to be in charge of their own play -- they need time, space, and props that encourage them to transform their past experiences creatively through the play process.

- **What children need.** Children need to have rich and meaningful life experiences which they can use as the content for their play; experiences which in some way connect to the deep developmental needs they have. While television can never substitute for children's direct experiences interacting with the world, it could provide them with the kind of content they need for their play -- stories that are meaningful to them, that they can take and reorder with their own past experience, developmental needs, and imagination.

- **What children see on television.** Much children's television programming consists of material that reflects the imagination of adults but is far removed from children's understanding and experience. Teenage Mutant Ninja Turtles, for example, human-sized turtles who were mutated by radiation and live in a city sewer and fight rodents, are difficult characters for children to incorporate into their play in broad, meaningful ways. When stories such as these -- removed from children's experience and understanding -- become the basis of children's play, the play scenarios are usually superficial and imitative because children have difficulty transforming these stories into their own elaborated play episodes. Single-purpose toys marketed along with these shows further this tendency toward imitation. The highly realistic toys focus children's attention on a single action (often a violent one). Children lose control over their play when they can no longer use props that they can shape and define according to their own evolving purposes and needs.

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• **Conclusion**. Children's television does not help children meet their developmental needs through play. Not only does television cut deeply into play time, it also provides a very narrow range of content for children to use in play. This narrow content is then reinforced by realistic, single-purpose toys that further undermine genuine play. Children end up imitating what they have seen rather than developing their own rich, unique interpretations. As a result, play is less likely to provide children with resolution of their needs and the deep, meaningful understandings that they need in order to develop optimally (Carlsson-Paige and Levin, 1987, 1990 & 1991).

Children's Needs First:
DEVELOPMENTALLY APPROPRIATE MEDIA

A very disturbing picture emerges when children's early developmental and educational needs are used as the criteria for assessing current television programming. Ideally, children's media would provide meaningful program content that helped them engage positively with the issues most basic to their healthy social, emotional and intellectual development. Instead, we have found that the issues most basic to children becoming productive and socially responsible members of society are being seriously undercut as current TV practices trivialize and distort children's most basic concerns and needs and undermine their very ability and efforts to resolve them.

Even worse, current programming diverts children from working on these issues by channeling them into an unhealthy focus on violence. As violence has increasingly become the central organizer of many children's programs, it has become intertwined with the fundamental ideas children are developing about gender, empowerment, autonomy and diversity. It is dangerous for children and society when children learn that independence and

13

empowerment come through violence and hurting others., that people solve their problems with violence. We see the results of the years of focus on violence by the media as the children who first fell prey to deregulated children's television in 1984 are entering middle and high school amidst an alarming increase in serious violence.

The fact that current television programming is seriously threatening children's play only serves to increase the negative effects of television on children's development. The content of many of the most popular children's shows does not offer appropriate or meaningful content for them to use to create rich, meaningful play scenarios. Even more destructive to healthy development are the highly realistic, single-purpose toys which are linked to TV programs. They channel children into imitating what they have seen on TV(most commonly violence) and prevent them from working through their own ideas creatively and constructively through play in which they have control. In losing control of their play, children are losing a vital source for making sense of experience, for learning and for gaining the ongoing sense of equilibrium they need for healthy development.

As the Federal Communications Commission sets the standards for what constitutes meeting the educational and informational requirements of the new Children's Television Act of 1990, it has a responsibility to children, parents and ultimately, to all of society to set the standards based on what we now know about how to support children's healthy development and learning. In implementing the act, the FCC must provide both guidelines about what is developmentally appropriate program content for children, as well as ban the link-up of children's programs with whole lines of toys (a practice which was not allowed prior to deregulation in 1984). Without strong regulations by the FCC

14

which protect children from the marketing practices that are undermining their healthy development and learning, the situation is unlikely to change.

The early childhood profession and others who have the best interests of children as their primary goal must begin to play a central role in helping the Federal Communications Commission define what constitutes TV programming that "serves the educational and informational needs" of young children. Current knowledge about how to appropriately meet children's developmental needs can provide a powerful lens for determining what does and does not constitute developmentally appropriate media for children. Knowledge used this way can:

- help the FCC make informed decisions about what does and does NOT constitute meeting the educational and informational needs of children as they assess the degree to which TV stations are complying with the Children's Television Act of 1990;

- assist the FCC and policy makers in determining the kinds of additional laws and policies that are required for broadcasting practices that support children and for eliminating practices that do harm to children.

- guide children's TV programmers and producers in their efforts to design children's programming which supports children's healthy development and learning;

- help parents and educators make informed judgments about what media children should and should not ..watch, and about how to help children use the media they do see in ways that can best support development

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A DEVELOPMENTAL FRAMEWORK FOR ASSESSING TELEVISION

Developmental Issue	What children see on TV	What children should see on TV
To establish a sense of trust and safety	The world is dangerous, enemies are everywhere, weapons are needed to feel safe.	A world where: people can be trusted and help each other, where safety and predictability can be achieved, fears can be overcome.
To develop a sense of autonomy with connectedness	Autonomy equated with fighting & weapons. Connectedness equated with helplessness, weakness & altruism.	A wide range of models of independence within meaningful relationships & of autonomous people helping each other.
To develop a sense of empowerment & efficacy in the world	Physical strength & violence equals power & efficacy. Range of ways to have an impact NOT shown, bad guys always return.	Provide many examples of people having a positive effect on their world without violence.
To establish gender identity	Exaggerated gender differences. Rigid divisions between the sexes. Boys are strong, violent & save the world. Girls are helpless, victimized & irrelevant to world events.	Complex characters with wide-ranging behaviors, interests & skills. Commonalities between the sexes overlap in what both can do.
To develop an appreciation of diversity among people	Racial & ethnic stereotyping. Dehumanized enemies often of color with foreign accents or non-human characteristics. Diversity is dangerous. Violence against those who are different is justified.	Expose children to diverse peoples, with varied talents, skills and needs, who treat each other with respect, work out problems nonviolently and enrich each others' lives.
To construct the foundations of morality & social responsibility	One dimensional characters who are all good or bad. Violence is the solution to interpersonal problems. Winning is the only acceptable outcome. Bad guys deserve to be hurt.	Complex chatacters who act responsibly & morally towards others- showing kindness & respect, working out moral problems, taking other peoples' points of view.
To have opportunities for meaningful play	Program content from far removed from children's experience or level of understanding. Program-linked toys promoting imitative, not creative play.	Meaningful content to use in play which resonating deeply with developmental needs. Shows not linked to realistic toys so childrencan create their own unique play.

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